

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MAURICE O. CURTIS)	
)	TRIAL BY JURY DEMANDED
Plaintiff,)	FILED: JULY 30, 2008
)	08CV4322
v.)	JUDGE KENDALL
)	MAGISTRATE JUDGE ASHMAN
WOODLAWN COMMUNITY)	
DEVELOPMENT CORPORATION)	
Defendant.)	PH

COMPLAINT

JURISDICTION AND VENUE

1. This is a suit to recover minimum wages and liquidated damages. Federal question jurisdiction is posited upon Title 28 U.S.C. 1331 and Title 29 U.S.C. 216(b), commonly known as the “Fair Labor Standards Act” (hereinafter “FLSA”), as amended, and acts prohibited thereunder. To plaintiff’s knowledge, other employees are aggrieved by the unlawful conduct alleged.

2. Defendant owns and operates WOODLAWN COMMUNITY DEVELOPMENT CORPORATION located at or near Harper Avenue Chicago, Illinois, 60405. The defendant is an “employer” of the plaintiff within the meaning of 29 U.S.C. 203(a) and (d) and the Minimum Wage Law, 820 ILCS 105/3. The court has supplemental jurisdiction over the claims under the Illinois Wage Payment and Collection Act claim, 820 ILCS 115/11(-c), the Illinois Minimum Wage Law, 820 ILCS 105/1-15 (ILMWL), and the One Day Rest in Seven Act, 820 ILCS 140/1 (2008), pursuant to the Judicial Improvements Act of 1990, 28 U.S.C. 1367(a)(1).

STATEMENT OF CLAIM

3. Plaintiff, MAURICE O. CURTIS, was employed by defendant as a resident janitor between approximately January 31, 2001 an December 31, 2007 at an hourly wage of \$14.00. During the time employed, he worked more than 40 hours in most work weeks for which he was willfully not compensated wages at the rate of one and one-half times his regular rate of pay, in violation of 29 U.S.C. 207(a) and the ILMWL, 820 ILCS 105/4a.

4. As a result thereof, there is now due plaintiff back wages, liquidated damages and other relief as provided by 29 U.S.C. 216(b)

PRAYER FOR RELIEF

5. WHEREFORE plaintiff, MAURICE O. CURTIS, asks the court to enter judgment in his favor, and against the defendants, WOODLAWN COMMUNITY DEVELOPMENT CORPORATION, for all back wages due, plus liquidated damages, attorney's fees and costs of the action due, and all relief provided by 29 U.S.C. 216(b); 820 ILCS 105/12; and the Illinois Wage Payment and Collection Act, 820 ILCS 115/11(c).

/s/ Ernest T. Rossiello
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Attorney for Plaintiff

Dated: July 30, 2008
Chicago, Illinois